## REMARKS

Claims 1-19 are pending in the present case. Claims 1, 7, 11 and 15 are

independent. Claims 1, 7, 11 and 15 are amended herein. Applicant

respectfully requests continuing examination in view of the above amendments

to the present application and the arguments set forth below. No new matter is

added herein. Applicant respectfully thanks the Examiner for granting the

telephonic interview of December 22, 2005.


CLAIM REJECTIONS

UNDER 35 USC § 112

Claims 1-19 are rejected under 35 USC § 112 (¶ 2) because the phrases

"closely represents" and "English-like," and the phrases "actual documentation

content" and "actual content" as used within clause 'b)' of independent Claims 1,

7, 11 and 15 are alleged to be indefinite.


As amended herein, Claims 1, 7, 11 and 15, the word "closely" is deleted

from the claims. Also as amended herein, the phrase "English-like" is replaced

with the phrase --natural language--. The phrase --natural language-- is used

throughout the specification as originally filed in the context with which it is

recited in the claims, for instance lines 5-7 at page 33 and lines 9-21 at page 34,

where it is explained that such natural language in documentation tags

"[a]dvantageously ... promote[ ] linguistic (e.g., natural language) localization."

Op. Cit at II. 20-22. The original specification describes the phrase "natural

language" as well from about lines 7-10 at page 39, which read as shown below for the Examiner's convenience.

Appropriate English (or other natural language) grammatical constructs, e.g., nouns and/or verbs, are extracted with the value from the 'help' field. In the present example, a noun, "seconds," is extracted from the 'help' field.

Further, independent Claims 1, 7, 11 and 15 are amended herein to clarify their clause 'b)'. As amended herein, the term "actual content" is deleted therefrom. As amended herein, Claim 1 reads as shown below.

1.      In a computer operating system using commands with command specifications in command definition files, a method for generating command documentation content, said method comprising:
a) examining a command definition file for a syntactic structure of a corresponding command, wherein said command definition file comprises a linkpoint, a keyword, and an argument;
b) extracting a documentation requirement from said syntactic structure wherein said syntactic structure represents documentation content of said command definition file with natural language syntax;
c) extracting documentation options from said syntactic structure wherein said documentation requirement and said documentation options correspond to a partial fraction of actual content of said command definition file;
d) combining said documentation requirement and said documentation options into a documentation tag construct wherein said documentation tag construct is embeddable into said command definition file; and
e) automatically generating a standard template for a documentation content file, wherein said document content file comprises a natural language explanation of said keyword and said argument, wherein said document content file provides a standard framework with automatically generated content and wherein said automatically generated content is end-user over-writable with at least one of documentation content and data of localized relevance to said end-user.

Independent Claims 7, 11 and 15 are amended herein after a similar fashion.

With the amendments discussed above, Applicants respectfully assert that

Claims 1-29 comply with 35 USC § 112 (¶ 2).

UNDER 35 USC § 103

Claims 1-19 are rejected under 35 USC § 103(a) over US Patent No. 5,893,916A to Dooley (hereinafter Dooley) in view of <u>Red Hat Linux</u> by Husain, et al. (hereinafter Husain) and US Patent No. 6,721,713 B1 to Guheen, et al. (hereinafter Guheen. Applicant has reviewed the references cited and respectfully asserts that Claims 1-19 are patentable over the cited references for the following rationale.

A.     As amended herein, Claim 1 reads as shown below, with underlining added for emphasis.

1.     In a computer operating system using commands with command specifications in command definition files, a method for generating command documentation content, said method comprising:

a) examining a command definition file for a syntactic structure of a corresponding command, wherein said command definition file comprises <u>a linkpoint</u>, a keyword, and an argument;

b) extracting a documentation requirement from said syntactic structure wherein said syntactic structure represents documentation content of said command definition file with natural language syntax;

c) extracting documentation options from said syntactic structure wherein said documentation requirement and said documentation options correspond to a partial fraction of actual content of said command definition file;

d) <u>combining said documentation requirement and said documentation options into a documentation tag construct wherein said documentation tag construct is embeddable into said command definition file</u>; and

e) automatically generating a standard template for a documentation content file, wherein said document content file comprises a natural language explanation of said keyword and said argument, wherein said document content file provides a standard framework with automatically generated content and wherein said automatically generated content is end-user over-writable with at least one of documentation content and data of localized relevance to said end-user.

Independent Claims 7, 11 and 15 are amended herein after a similar fashion.

Claims 2-6, 8-10, 12-14, and 16-19 respectively depend on independent Claims

1, 7, 11, and 15 and incorporate each of their elements.


As amended herein, Claims 1-19 recite that the command definition file

contains a linkpoint, a keyword and an argument. Applicant finds no teaching or

suggestion in Dooley and/or Guheen that is directed towards a command

definition file containing a linkpoint. Applicant finds no teaching or suggestion in

Husain that cures these defects of Dooley and Guheen. For at least this reason,

Applicants respectfully assert that Claims 1-19 are allowable over the cited

references under 35 USC 103(a).


The Examiner alleges at page 6 of the instant OA however that the

"manual section" expressly taught in Husain corresponds to the linkpoint recited

herein. Applicant respectfully disagrees for the following rationale. As defined in

the original specification in the above captioned Application, for instance from

lines 21-25 at page 14, a linkpoint "is the first keyword in a command." Thus,

Applicant respectfully maintains the assertion that Husain fails to teach or

suggest the linkpoint element recited herein, as clearly defined in the

specification and fails to cure this defect in the Dooley and Guheen references.


Moreover, Applicant respectfully asserts that giving the "manual sections"

expressly taught by Husain the Examiner's definition as a linkpoint explicitly

teaches away from the linkpoint element recited herein, which in contrast thereto

relates to the first keyword of a command. Further, Husain expressly teaches

that "some man [manual] pages are not about commands at all, but rather about

files or system calls used in Linux!" (exclamatory emphasis in original). Applicant

respectfully asserts that, in teaching that its man pages relate to other than

commands, Husain also teaches away from the embodiments recited herein,

which relate to commands. Applicant respectfully asserts that Husain thus fails

to provide a motivation to achieve the embodiments recited herein. For this

additional reason, Applicant respectfully asserts that Claims 1-19 are allowable

over the cited references under 35 USC 103(a).


B.    · As amended herein, Claims 1-19 recite that a documentation

requirement and documentation options are combined into a documentation tag

construct, which is embeddable into the command definition file. The

embodiment recited herein is described in the original specification of the above

captioned Application, for instance with reference to Figures 3A, 3B, 4 and 5

from about line 15 at page 26 through about line 23 at page 28. Combining the

documentation requirement with documentation options into a documentation tag

construct that is embeddable into the command definition file beneficially allows

augmentation of command definition files with additional and accessible

documentation information.


Applicant finds no teaching or suggestion in Dooley that is directed

towards combining a documentation requirements and documentation options

into a documentation tag construct, which is embeddable into the command definition file. Applicant finds nothing in Husain and/or Guheen that cures this defect of Dooley. For at least this reason, Applicants respectfully assert that Claims 1-19 are allowable over the cited references under 35 USC 103(a).

Moreover, Applicant notes that Dooley expressly delimits its teachings to converting text based UNIX man pages to formatted help topic files. Guheen at col. 1, ll. 55-60. Dooley goes on to teach that its utility lies in facilitating porting the on-line help documents of applications to multiple platforms (e.g., Windows, etc.). Id. at ll. 60-67. The reference clearly states that the "preferred application of [the Dooley] invention is in automating the conversion of UNIX man pages to Windows-compatible help topic files that are used with the help application resident in the Microsoft Windows ... operating systems [OSs]." Id. at col. 2, ll. 57-61. Further, the reference teaches that man pages are "coded ASCII format help documents" (Id. at col. 1, ll. 30-32), which "are typically stored alone or in groups in text files which provide information regarding particular UNIX commands or functions." Id. at col. 2, ll. 62-64. Throughout the reference, Dooley's teaching is expressly directed to help topic files.

In contrast, the present embodiment recites that the documentation tag constructs formed by combining documentation requirements and documentation options, are embeddable in command definition files. Command definition files, as described in the original specification of the above captioned

Application, for instance from about line 9 at page 21 through about line 10 at page 11, delineates the syntax of a particular command and "reflects its respective command syntactically with perfect correspondence."

Thus, in expressly directing its teachings to help topic files and their porting between various platforms, Dooley teaches away from the present embodiment recited herein, which relates to combining documentation requirements and documentation options into a documentation tag construct, which is embeddable into the command definition file. Applicant finds nothing in Husain and/or Guheen that cures this defect of Dooley.

Applicant also notes that Husain delimits its own teaching to Linux man pages after a similar fashion as Dooley and thus also teaches away from the present recited embodiment. Applicant finds nothing in Dooley and/or Guheen that cures this defect of Husain.

Further, while Applicant finds no teaching or suggestion within Guheen that is directed towards command definition files, command documentation requirements, command documentation options and documentation tag constructs in general, and/or more particularly to combining documentation requirements and documentation options into a documentation tag construct and/or the embeddability of documentation tag constructs into a command definition file, as recited herein, Applicant does note that Guheen expressly

states the relationship of its teaching to <u>identifying alliances of multiple business</u>

<u>entities in a network framework</u>.  <u>Guheen</u> at col. 1, ll. 5-8; col. 1, l. 66-col. 2, l. 30;

Abstract.  Applicant respectfully asserts that Guheen thus expressly places its

teachings in the context of an <u>art that is not analogous</u> to the present

embodiment recited herein and thus also <u>teaches away</u> therefrom.  Applicant

finds nothing in Dooley and/or Husain that cures this defect of Guheen.


In as much as Dooley, Husain and Guheen each <u>teach away</u> from the

present embodiment recited herein as discussed above, Applicant finds <u>no</u>

<u>suggestion or motivation in the references to combine their teachings to workably</u>

<u>produce</u> the claimed embodiment.  For these additional reasons, Applicant

respectfully asserts that Claims 1-29 are allowable over the cited references

under 35 USC 103(a).


     C.    As amended herein, Claims 1-19 recite that a standard template

for a documentation content file is automatically generated, which comprises a

natural language explanation of the keyword and argument and which provides a

standard framework with automatically generated content is end-user over-

writable with at least one of documentation content and data of localized

relevance to said end-user.  The standard framework of the automatically

generated documentation content file beneficially promotes simplicity and

uniformity and can help reduce tedium, errors and omissions.  Allowing end

users to over-write its automatically generated documentation content with their

own documentation content and/or locally relevant data systematically supports

linguistic localization and higher level documentation.


Applicant finds no teaching or suggestion in Dooley that is directed

towards automatically generating a standard template for a documentation

content file that comprises a standard framework with automatically generated

content is end-user over-writable with documentation content and/or data of

localized relevance to the end-user, as recited in the claimed embodiment

herein. Applicant finds nothing in Husain and/or Guheen that cures this defect of

Dooley. For at least this reason, Applicants respectfully assert that Claims 1-19

are allowable over the cited references under 35 USC 103(a).


Moreover, none of the help files produced under the teachings of Dooley

appear to Applicant to be over-writable by an end user. Likewise, the man pages

taught by Husain do not appear to Applicant to be over-writable by an end user.

Thus, Dooley and Husain each teach away from the claimed embodiment recited

herein. As discussed above, Guheen expressly places its teachings in the

context of an art that is not analogous to the claimed embodiment recited herein

and thus also teaches away therefrom.


However, the Examiner alleges at page 7 of the instant OA that the Web

Architecture Framework (WAF) taught by Guheen corresponds to the

"documentation content file[, which] provides a standard framework with

automatically generated content that is end-user over-writable with one or more

of documentation content and data of relevance and localized to said end-user"

and references Guheen at col. 278, ll. 32-40 and col. 279, ll. 1-3.  The Examiner

there further alleges that Guheen teaches a "content management and

publishing services component [that] includes localization and translation

capabilities and references Guheen at col. 219, ll. 43-44.  Applicant respectfully

disagrees for the following rationale.


Guheen's recitations, to which the Examiner refers at col. 278, ll. 32-40

and col. 279, ll. 1-3, expressly relate to the "WAF support[ing] as many

simultaneous predefined increment types as may be practical for a given type of

content and business model." Op. Cit. at col. 269, ll. 59-61.  As used therein, the

word "content" is described in one instance directly above the foregoing quote as

"content over time for audio or video or any other increment that can be identified

by content provider mapping efforts, such as [in list format]: sentences,

paragraphs, articles, database records, and byte offsets representing increments

of logically related information." Id. at ll.50-58.


Applicant respectfully points out that, in the places referred to by the

Examiner, Guheen is not teaching about command documentation for a

computer operating system, as recited herein.  On the contrary, in these

passages, Guheen is expressly teaching a WAF. Id. at ll. 59-61.  Further,

Guheen expressly sets the context of the citations above in that of "web site

testing tools (performance & link spiders)" [capitalization in original omitted] (Op. Cit. at col. 266, ll. 45-46). As Applicant understands the reference, the citations above are describing element 1432 (see Guheen at col. 265, l. 30) of Figure 65 therein, which is "a block diagram of a [WAF]" (Op. Cit. at col. 5, ll. 58-64) and Figure 97 therein, which is "a flowchart illustrating the web developer services." Op. Cit. at col. 7, ll. 27-28.

Further still, Guheen's recitations, to which the Examiner refers at col. 219, ll. 43-44, are expressly directed towards [in list format; semicolons substituted herein for brevity]: "provid[ing] translation services from single to entire web sites, text-embedded in [sic] images, Java and Javascript [sic] source code and parameters, CGI scripts, database files, Email, Adobe PDF files; enabl[ing] site update and maintenance procedures for localization [emphasis added]; alert[ing] local web site content managers to changes in web site [sic]; and track[ing] localization process." Applicant respectfully points out that, in the places referred to by the Examiner, Guheen is not teaching about command documentation for a computer operating system, as recited herein. On the contrary, in these passages, Guheen is also expressly teaching a WAF. Id. Thus, Applicant respectfully maintains the assertion that Guheen teaches away from the recited embodiments herein in a non-analogous art.

As Applicant understands the reference, the citations above describe a "content mgmt & publishing services component," element 1408 of Figure 65D

therein. Quoting Guheen, "One embodiment of the [Guheen] invention,

illustrated in FIG. 65 as component 1408, is provided for affording a combination

of content management and publishing-related web application services." Op.

Cit. at col. 211, ll. 7-10, emphasis added. Applicant thus also respectfully

maintains the assertion that Guheen teaches away from the recited

embodiments herein in a non-analogous art.


Moreover, Applicant respectfully asserts that the combination of Guheen

and Husain and/or Dooley fails to teach, suggest or motivate the present

invention as claimed because the combination of Guheen with Husain and/or

Dooley does not satisfy the requirements of a *prima facie* case of obviousness.

In order to establish a *prima facie* case of obviousness, the cited prior art must

suggest the desirability of the claimed invention (MPEP 2142). In particular, "if

the proposed modification or combination of the prior art would change the

principle of operation of the prior art invention being modified, then the teachings

of the references are not sufficient to render the claims *prima facie* obvious"

(emphasis added) (MPEP 2143.01; *In re Ratti*, 270 F.2d 810, 123 USPQ 349

(CCPA 1959)). Moreover, "[i]f the proposed modification would render the prior

art invention being modified unsatisfactory for its intended purpose, then there is

no suggestion or motivation to make the proposed amendment" (emphasis

added) (MPEP 2143.01; *In re Gordon*, 733 F.2d 900, 221 USPQ 1125 (Fed. Cir.

1984)).

Dooley refers to converting man pages to help topic files for porting

applications between OSs and Husain to the use of Linux man pages, as

discussed above.  Guheen, on the other hand refers to a WAF, as discussed

above.  Applicant thus respectfully asserts that the combination of Guheen with

Dooley and/or Husain would change the principle of operation taught in those

references and further, could render the teachings of Dooley and/or Husain

unsatisfactory for their respective intended purposes.


Further, Applicant infers from the clear wording of the reference that

"component 1408" on line 8 therein identifies "the embodiment" mentioned on

line 7 therein.  However, Guheen's element 1432, discussed above, identifies

"web developer services." Op. Cit. at Fig. 65F and col. 265, l. 30.  Quoting

Guheen, "As shown in component 1432 of FIG. 65, one embodiment of the

present invention is provided for affording a combination of web development-

related services." Id. at ll. 30-32, emphasis added.  Applicant notes that, by the

clear wording of the reference, Guheen's elements 1408 and 1432 expressly

refer to separate embodiments taught therein.


Applicant understands page 7 of the instant OA to refer to Guheen's web

developer services element 1432 as corresponding to "providing a standard

framework with automatically generated content that is end-user over-writable

with ... documentation content."  Applicant further understands page 7 of the

instant OA to refer to the "localization and translation capabilities" of Guheen's

content management and publishing-related web application services element

1408 as corresponding to " end-user over-writable with ... data of relevance and

localized to said end user."

Applicant respectfully points out that as referred to in the instant OA, the

two separate embodiments taught by Guheen in its elements 1408 and 1432

would change the principle of operation as combined. In particular, element

1408 therein is "provided for affording a combination of content management

and publishing-related web application services," whereas element 1432 is

"provided for affording a combination of web development-related services  Op.

Cit. As discussed above however, these elements both refer to distinct and

separate embodiments of the Guheen invention. Thus, to function as referred to

in the instant OA, the principles of operation of each embodiment would differ

from that as expressly taught in Guheen. Further, to function as referred to in

the instant OA, the principles of operation of Guheen's content management and

publishing-related web application services embodiment ("1432") could render

the web development related services embodiment ("1408") unsuitable for its

intended purpose, and vice versa.

Applicant finds nothing in Dooley and/or Husain that cures this defect of

Guheen. Applicant thus maintains the assertion that the combination of Guheen

with Dooley and/or Husain fails to teach, suggest or motivate the claimed

embodiments recited herein. For these additional reasons therefore, Applicant

respectfully asserts that Claims 1-19 are allowable over the cited references

under 35 USC §103(a).


CONCLUSION

By the rationale stated above, Applicants respectfully assert that Claims

1-19 are allowable under 35 USC §§ 103(a) and 112(¶ 2).  Accordingly,

Applicants respectfully request that the rejections of Claims 1-19 be withdrawn

and that Claims 1-19 be allowed.


Please charge our deposit account No. 23-0085, for any unpaid fees.


Respectfully submitted,

WAGNER, MURABITO & HAO, LLP


Dated: _Feb. 15_____, 2006
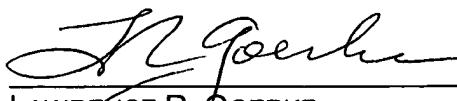
LAWRENCE R. GOERKE
Reg. No. 45,927

WAGNER, MURABITO & HAO, LLP
Two North Market Street, Third Floor
San Jose, CA 95113

Tel.:   (408) 938-9060
Fax:   (408) 938-9069